REMARKS

Claim 1 is the only claim pending in the present application. Claim 1 has been amended for clarity and to recite aspects of the disclosed embodiments with particularity. Support for the foregoing amendment is found throughout the present application, and in particular, in the text at pages 10-13. No new matter has been added.

Claim 1 stands rejected under 35 U.S.C. §112, first and second paragraphs. Additionally, claim 1 stands rejected under 35 U.S.C. § 102(b) as anticipated by United States Patent 5,657,394 to Schwartz et al. Applicant respectfully requests reconsideration and allowance of claim 1 based upon the following remarks.

Support for pending claim 1 is found at least in the portions of the present application noted above. Accordingly, the rejections under 35 U.S.C. §112, first and second paragraphs, should be withdrawn. Additionally, the Schwartz patent fails to teach or to suggest every element recited in pending claim 1. For example, the Schwartz patent neither teaches nor contemplates a system which obtains and analyzes scrub mark pattern data both from a probe card analyzer and a scrub mark analyzer as set forth in the present application and as recited with particularity in claim 1. In fact, the Schwartz system is designed specifically to <u>predict</u> scrub mark patterns <u>without actually making any scrub marks at all</u> (col. 5, ll. 54-65). Accordingly, the Schwartz reference is insufficient to anticipate pending claim 1, and the rejection under 35 U.S.C. §102(b) should be withdrawn.

CONCLUSION

Based upon the foregoing analysis, Applicant respectfully submits that the present application is currently in condition for allowance.

Applicant believes that no additional fee is required at this time. Please apply any charges or credit any overpayments to Deposit Account No. 03-3975.

Respectfully submitted, Pillsbury Winthrop LLP

By:

Victor J. Castellucci Reg. No. 43,535

Tel: (858) 509-4007 Fax: (858) 509-4010

Dated: June 4, 2003

APPENDIX VERSION WITH MARKINGS TO SHOW CHANGES MADE

In the Claims:

Please amend claim 1 as follows:

1. (Amended) An opto-mechanical workstation for loading [, systemically] and systematically moving wafers [,] and for imaging [,] and analyzing scrub marks [the pads of wafers and dies]; said workstation comprising:

a probe card analyzer;

a scrub mark analyzer;

an imaging apparatus configured and operative to obtain images of first scrub marks made by probe card pins on a check plate in said probe card analyzer and images of second scrub marks made by said probe card pins on bonding pads in said scrub mark analyzer; and

a data processor coupled to said imaging apparatus and configured and operative to obtain scrub mark data associated with said first scrub marks and scrub pattern data associated with said second scrub marks and to analyze said scrub mark data and said scrub pattern data; wherein said data processor allows prediction of the behavior of a probe pin on a semiconductor die metalization pad.